

Robert A. Mittelstaedt (#060359)  
ramittelstaedt@jonesday.com  
Caroline N. Mitchell (#143124)  
cnmitchell@jonesday.com  
JONES DAY  
555 California Street, 26th Floor  
San Francisco, CA 94104  
Telephone: (415) 626-3939  
Facsimile: (415) 875-5700

Attorneys for Defendants  
CHEVRON CORPORATION and CHEVRON  
INVESTMENTS INC.

Marco Simons  
marco@earthrights.org  
EARTHRIGHTS INTERNATIONAL  
1612 K Street NW, Suite 401  
Washington, DC 20006  
Telephone: (202) 466-5188  
Facsimile: (202) 466-5189

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

LARRY BOWOTO, et. al.

Plaintiffs,

v.

CHEVRONTEXACO CORPORATION, et  
al.,  
Defendants.

**Case No. C-99-2506-SI**

**PARTIES' STIPULATION REGARDING THE  
USE OF STATE COURT DISCOVERY IN THE  
FEDERAL COURT ACTION**

THE PARTIES STIPULATE AS FOLLOWS:

All responses to interrogatories and requests for admission made, all documents produced and all depositions taken in the state court action, *Larry Bowoto, et al., v. ChevronTexaco Corporation, et al.*, CGC-03-417580 (County of San Francisco), by the parties to the federal court action, *Larry Bowoto, et al., v. ChevronTexaco Corporation, et al.*, C-99-2506-SI (N.D. Cal.), may be used in the federal court action to the same extent as if the state discovery had been propounded and responded to in the federal court action; EXCEPT THAT defendants reserve the right to object to the use in the federal court action of any discovery obtained in the state court action after the discovery cut-off date in the federal court action.

DATED: November 9, 2005

JONES DAY

By: s//Caroline N. Mitchell  
Caroline N. Mitchell

Attorneys for Defendants

DATED: November \_\_, 2005

EARTHRIGHTS INTERNATIONAL

By: \_\_\_\_\_  
Marco Simons

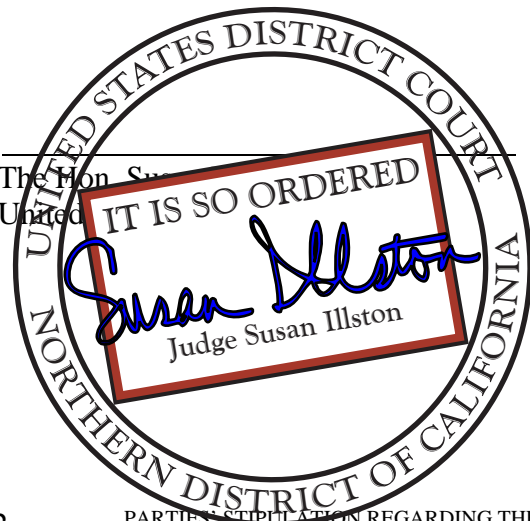
Attorneys for Plaintiffs

IT IS SO ORDERED.

DATED: November \_\_, 2005

By: \_\_\_\_\_

The Hon. Susan Illston  
United States District Court  
Northern District of California



SFI-531547v1